VIA ECFS

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

Re: Petitions of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver, Minneapolis-St. Paul, Phoenix, and Seattle Metropolitan Statistical Areas, WC Docket No. 07-97

Dear Ms. Dortch:

The undersigned parties hereby submit the attached white papers in the record in the above-captioned proceeding. The first white paper, by Kent Mikkelsen of Economists Incorporated, is entitled "Mobile Wireless Service to 'Cut the Cord' Households in FCC Analysis of Wireline Competition." The second white paper, by Joseph Gillan of Gillan Associates, is entitled "Properly Estimating the Size of the Wireless-Only Market." These papers address, respectively, whether mobile wireless service belongs in the wireline product market, and if so, the extent to which the FCC can rely on estimates of wireless-only subscribers to measure wireless-wireline substitution. Also attached hereto is Dr. Mikkelsen's curriculum vitae.

Please do not hesitate to contact me at (202) 303-1000 if you have any questions or concerns about this submission.

Respectfully submitted,

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